

Exhibit A

Ahilan T. Arulanantham (SBN 237841)
arulanantham@law.ucla.edu
Stephany Martinez Tiffer (SBN 341254)
martineztiffer@law.ucla.edu
CENTER FOR IMMIGRATION LAW AND
POLICY, UCLA SCHOOL OF LAW
385 Charles E. Young Dr. East
Los Angeles, CA 90095
Telephone: (310) 825-1029

Emilou MacLean (SBN 319071)
emaclean@aclunc.org
Michelle (Minju) Y. Cho (SBN 321939)
mcho@aclunc.org
Amanda Young (SBN 359753)
ayoung@aclunc.org
ACLU FOUNDATION
OF NORTHERN CALIFORNIA
39 Drumm Street
San Francisco, CA 94111-4805
Telephone: (415) 621-2493
Facsimile: (415) 863-7832

Attorneys for Plaintiffs
[Additional Counsel Listed on Next Page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, MARIELA GONZÁLEZ, FREDDY JOSE ARAPE RIVAS, M.H., CECILIA DANIELA GONZÁLEZ HERRERA, ALBA CECILIA PURICA HERNÁNDEZ, E.R., HENDRINA VIVAS CASTILLO, A.C.A., SHERIKA BLANC, VILES DORSAINVIL, and G.S..

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, UNITED
STATES DEPARTMENT OF HOMELAND
SECURITY, and UNITED STATES OF
AMERICA

Defendants

Case No. 3:25-cv-01766-EMC

**PLAINTIFF NATIONAL TPS
ALLIANCE'S REQUESTS FOR
PRODUCTION OF DOCUMENTS TO
DEFENDANT U.S. DEPARTMENT OF
HOMELAND SECURITY (SET ONE)**

1 Additional Counsel for Plaintiffs

2 Jessica Karp Bansal (SBN 277347)

jessica@ndlön.org

3 Lauren Michel Wilfong (*Pro Hac Vice*)

lwilfong@ndlön.org

4 NATIONAL DAY LABORER

ORGANIZING NETWORK

5 1030 S. Arroyo Parkway, Suite 106

Pasadena, CA 91105

6 Telephone: (626) 214-5689

7 Eva L. Bitran (SBN 302081)

ebitran@aclusocal.org

8 ACLU FOUNDATION

OF SOUTHERN CALIFORNIA

9 1313 West 8th Street

Los Angeles, CA 90017

10 Telephone: (213) 977-5236

11 Erik Crew (*Pro Hac Vice*)

ecrew@haitianbridge.org

12 HAITIAN BRIDGE ALLIANCE

4560 Alvarado Canyon Road, 1H

13 San Diego, CA 92120

Telephone: (949) 603-7411

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1 **PROPOUNDING PARTY:** Plaintiff National TPS Alliance

2 **RESPONDING PARTY:** Defendant U.S. Department of Homeland Security

3 **NO.:** One

4 Plaintiff National TPS Alliance hereby requests that Defendant U.S. Department of
 5 Homeland Security (“DHS”) produce for inspection and photocopying all documents and tangible
 6 things responsive to the categories described below to the attention of Emilou MacLean at the
 7 offices of ACLU of Northern California, 39 Drumm St, San Francisco, CA 94111 or via electronic
 8 submission to Plaintiffs’ counsel.

9 **REQUEST FOR PRODUCTION NO. 1:**

10 All communications since January 17, 2025 involving the Custodians listed in the Appendix
 11 (as to all such positions, whether acting or appointed), regarding whether to vacate, partially vacate,
 12 or terminate the TPS designations for Venezuela or Haiti.

13 **REQUEST FOR PRODUCTION NO. 2:**

14 All communications involving the Custodians listed in the Appendix (as to all such positions,
 15 whether acting or appointed), between January 20, 2025 and February 28, 2025 concerning the TPS
 16 periodic review process during that time period to the extent applied in whole or in part to the
 17 decisions to vacate, partially vacate, or terminate TPS designations for Venezuela or Haiti.

18 **REQUEST FOR PRODUCTION NO. 3:**

19 All documents and communications since January 17, 2025 about DHS press releases or
 20 internal DHS memoranda concerning vacating, partially vacating, or terminating TPS designations
 21 for Venezuela or Haiti, including any memoranda or guidance about how to respond to questions
 22 from media or TPS holders about such decisions.

23 **REQUEST FOR PRODUCTION NO. 4:**

24 The fully-executed “Record of Clearance and Approval” (or the equivalent approval
 25 document), with attachments, for the decision to vacate the January 17, 2025, TPS extension for
 26 Venezuela. (See HT Vacatur AR_0164.)

REQUEST FOR PRODUCTION NO. 5:

The fully-executed DHS “Record of Clearance and Approval” (or the equivalent approval document), with attachments, for the decision to terminate the October 3, 2023, TPS designation for Venezuela. (See HT Vacatur AR_0164.)

REQUEST FOR PRODUCTION NO. 6:

All documents provided to, reviewed by, or considered by the Secretary of DHS regarding whether to vacate, partially vacate or terminate the TPS designation for Venezuela or Haiti which have not already been produced as part of the administrative record.

REQUEST FOR PRODUCTION NO. 7:

Documents sufficient to show the contents of each U.S. diplomatic cable to or from an overseas U.S. State Department facility since January 17, 2025 regarding whether to vacate, partially vacate, or terminate the TPS designations for Venezuela or Haiti.

REQUEST FOR PRODUCTION NO. 8:

The complete administrative record for the January 17, 2025 decision to extend the TPS designation for Venezuela.

REQUEST FOR PRODUCTION NO. 9:

The complete administrative record for the July 1, 2024 decision to extend the TPS designation for Haiti.

Date: April 30, 2025

Respectfully submitted,

CENTER FOR IMMIGRATION LAW AND
POLICY, UCLA SCHOOL OF LAW or
ACLU FOUNDATION
OF NORTHERN CALIFORNIA

/s/ Emilou MacLean

Ahilan T. Arulanantham / Emilou MacLean
Stephany Martinez Tiffer / Michelle (Minju)
Y. Cho

Emilou MacLean
Michelle (Minju) Y. Cho
Amanda Young
ACLU FOUNDATION
OF NORTHERN CALIFORNIA

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
Eva L. Bitran
ACLU FOUNDATION
OF SOUTHERN CALIFORNIA

Jessica Karp Bansal
Lauren Michel Wilfong (*Pro Hac Vice*)
NATIONAL DAY LABORER
ORGANIZING NETWORK

Erik Crew (*Pro Hac Vice*)
HAITIAN BRIDGE Alliance

Attorneys for Plaintiffs

Appendix: Custodian List

A. Individuals Identified as Involved In TPS Decisions Based on Administrative Record Productions (See HT Vacatur AR_0164.)

- Senior Counselor Rob Law
- Senior Advisor Jimmy Percival
- Senior Advisor Joseph Mazzara
- Senior Advisor Joseph Guy
- Senior Advisor Troup Hemenway
- Senior Advisor Troy Edgar
- Chief Advisor Corey Lewandowsky

B. USCIS

- A. Director (or Senior Official Performing the Duties of the Director)
 - Jennifer Higgins – Jan. 20, 2025 - Feb. 8, 2025
 - Kika Scott – Feb. 9, 2025 - present
- B. Chief of Staff of Director
 - Aaron Calkins – Jan. 20, 2025 - present
- C. Chief of Office of Policy and Strategy (OP&S)
 - Samantha Deshommes - Jan. 20, 2025 - present
- D. Senior Policy Advisor(s) or Policy Advisor(s) to Chief of Office of Policy and Strategy (with a role related to TPS)
- E. Associate Director, International and Humanitarian Affairs (or International and Refugee Affairs)
- F. Associate Director, External Affairs Directorate (EAD)
 - Carrie Selby – Jan. 20, 2021 – present (acting or appointed)
- G. Director, Refugee, Asylum and International Operations Directorate (RAIO)
- H. Associate Director, Refugee, Asylum and International Operations Directorate (RAIO)
 - Ted Kim – Sept. 13, 2021 – present (acting or appointed)
- I. Research Unit, Refugee, Asylum and International Operations Directorate (RAIO)
- J. Chief Counsel
 - John Miles - Jan. 20, 2025 - present
- K. Associate Director, Service Center Operations Directorate
 - Connie Nolan – Feb. 22, 2023 - present
- L. TPS Subject Matter Experts

C. Department of Homeland Security

- A. Secretary
 - Kristi Noem
- B. Chief of Staff to Secretary
- C. Deputy Secretary
 - Troy Edgar
- D. Advisor or Senior Advisor (with a role related to TPS)
- E. General Counsel
 - Joseph Mazzara
- F. Under Secretary, Management

1 • Benjamin Huffman (Senior Official Performing the Duties)
2 G. Under Secretary, Office of Strategy, Policy, and Plans
3 • Christopher C. Pratt (Senior Official Performing the Duties)
4 H. Assistant Secretary for Counterterrorism, Threat Prevention and Law Enforcement,
5 Office of Strategy, Policy and Plans (OSPP)
6 I. Assistant Secretary, Office of Public Affairs
7 • Tricia McLaughlin
8 J. Principal Deputy Assistant Secretary for Media Relations,
9 • Harry Fones
10 K. Under Secretary, Office of Intelligence and Analysis
11 • Daniel Tamburello (Senior Official Performing the Duties)
12 L. Executive Associate Director, Enforcement and Removal Operations
13 • Tom Homan

14
15
16
17
18
19
20
21
22
23
24
25
26
27
28